

(Del. Rev. 12/98)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Kendall Raye Rogers

(Name of Plaintiff or Plaintiffs)

v.

CIVIL ACTION No. 05-721

State of Delaware, Dept.
of Public Safety/Dmv

(Name of Defendant or Defendants)

Amended
COMPLAINT UNDER TITLE VII

OF THE CIVIL RIGHTS ACT OF 1964



1. This action is brought pursuant to *Title VII of the Civil Rights Act of 1964*, as amended, for **employment discrimination**. Jurisdiction exists by virtue of 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff resides at 23 S. Kirkwood St.

(Street Address)

Dover Kent DE. 19904

(City)

(County)

(State)

(Zip Code)

302 678 1218

(Area Code) (Phone Number)

3. Defendant resides at, or its business is located at 303 Transportation,

(Street Address)

Circle, Dover Kent DE. 19903-0810

(City)

(County)

(State)

(Zip Code)

4. The discriminatory conduct occurred in connection with plaintiff's employment at, or application to be employed at, defendant's _____ place of business

(Defendant's Name)

located at _____

(Street Address)

(City)

(County)

(State)

(Zip Code)

5. The alleged discriminatory acts occurred on 10 (Day), 2 (Month), 03 (Year).

6. The alleged discriminatory practice ☐ is ☒ is not continuing.

7. Plaintiff filed charges with the Department of Labor of the State of Delaware,

Division of Industrial Affairs (Agency) 4425 N. Market St. (Street Address) Wilmington DE (City) 19802 (Zip Code)

DE (County) DE (State) 19802 (Zip Code), regarding

defendant's alleged discriminatory conduct on 12 (Day), 2 (Month), 03 (Year).

8. Plaintiff filed charges with the Equal Employment opportunity Commission of the United States regarding defendant's alleged discriminatory conduct on: 12 (Day), 2 (Month), 03 (Year).

9. The Equal Employment Opportunity Commission issued the attached Notice-of-Right-to-Sue letter which was received by plaintiff on: 19 (Day), Jul (Month), 05 (Year).

(NOTE: ATTACH NOTICE-OF-RIGHT-TO-SUE LETTER TO THIS COMPLAINT.)

10. The alleged discriminatory acts, in this suit, concern:

- A. ☒ Failure to employ plaintiff.
- B. ☒ Termination of plaintiff's employment.
- C. ☒ Failure to promote plaintiff.
- D. ☒ Other acts (please specify below)

11. Defendant's conduct is discriminatory with respect to the following:

- A. ☒ Plaintiff's race
- B. ☒ Plaintiff's color
- C. ☒ Plaintiff's sex
- D. ☒ Plaintiff's religion
- E. ☒ Plaintiff's national origin

12. A copy of the charges filed with the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of plaintiff's claim.

13. If relief is not granted, plaintiffs will be irreparably denied rights secured by Title VII of the 1964 Civil Rights Act, as amended.

14. Plaintiff's has no adequate remedy at law to redress the wrongs described above.

THEREFORE, Plaintiff prays as follows: (Check appropriate letter(s))

- A. ☒ That all fees, cost or security attendant to this litigation be hereby waived.
- B. ☒ That the Court appoint legal counsel.
- C. ☒ That the Court grant such relief as may be appropriate, including injunctive orders, damages, cost and attorney's fees.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: _____

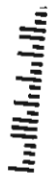
(Signature of Plaintiff)

(Signature of additional Plaintiff)



UNITED STATES
POSTAL SERVICE

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From:

Russell Koryan
23 S. Kirkwood St.
Dover De. 19904

Office of the Clerk
To: United States District Court
District of Delaware
Lockbox 18 844 King St.
U.S. Courthouse Wilm. De.
19801

FIRST CLASS